

# Thomas-Jensen Affirmation

Exhibit # 112

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK; et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as  
President of the United States; et al.,

Defendants.

C.A. No. 1:25-cv-00039-JJM-PAS

**DECLARATION OF SARAH  
NORRIS HALL**

**Declaration of Sarah Norris Hall**

I, Sarah Norris Hall, declare as follows:

1. I am a resident of the State of Washington. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the University of Washington as Senior Vice President, Finance, Planning & Budgeting and Chief Financial Officer. In my role, I am responsible for the financial management, planning and budgeting activities of the University, including oversight of post award administration and federal cash management.

3. The University of Washington is the flagship university of the state of Washington. Since its founding in 1861, it has been a hub for learning, innovation, problem solving, economic development and community building. Driven by a mission to serve the greater good, our students, faculty and staff tackle today's most pressing challenges with courage and creativity, making a difference across Washington state—and around the world. As part of its mission, the UW engages in research and direct service, which frequently rely in whole or in part on federal financial assistance.

4. The UW receives more federal research dollars than any other U.S. public university. The university, as of February 3, 2025, had 3,567 active federal direct and passthrough awards, of which more than 1,700 awards had outstanding accounts receivable with federal agencies. Additionally, the University of Washington receives nearly \$300 million from the Department of Education in the form of Federal Direct Student Loans, more than \$53 million under the Federal Pell Grant Program, and more than \$10 million under the Federal Perkins Loan Program. Altogether, the University of Washington received more than \$1.6 billion in federal funding in 2024, comprising more than 13% of its entire budget. The University of Washington's economic impact from all forms of sponsored research activities exceeds \$2.6 billion, supporting and sustaining 10,641 statewide jobs and generating more than \$93 million in Washington state and local tax revenue.

5. These funds cover everything from climate research and small-cell battery development to HIV/AIDS healthcare delivery in the developing world facilitated by thousands of world class faculty and staff across more than 270 research centers, institutes and collaboratives. These grants come from numerous federal agencies, including the Department of Health and Human Services, the National Science Foundation, the Department of Energy, the Department of Education, the Department of Defense, the Department of Commerce, the Department of Transportation, the Department of Agriculture, NASA, the National Endowment for the Arts, Department of Interior, Department of Homeland Security, and Department of Veterans Affairs, among others.

6. The University of Washington's budget for this year relies on federal agencies continuing to reimburse the University for allowable expenditures incurred in carrying out the scope of awarded federal grants and contracts. The University has made extensive plans and allocated funding for staffing, operations, and research infrastructure based on the anticipated receipt of Federal funding as awarded to the University by dozens of federal agencies across 3,567 active federal direct and passthrough grants.

7. Any pause in federal funding to the University would cause institution-wide chaos.

Even a temporary pause in funding could require the University to shutter or reduce programs, including mission-critical research activities, instruction, and public service activities and to furlough and/or lay off employees. It would shut off funding for graduate students and post-docs and imperil visas for foreign students, potentially forcing them out of their programs. And it would reduce or halt services to people served by the University's programs. To take just one example, the University supports health clinics in multiple countries under the President's Emergency Plan for AIDS Relief; halting funding would mean canceling appointments and interrupting healthcare delivery for patients.

8. On a University-wide scale, a freeze on the University's ability to receive contractually agreed-to reimbursement for expenditures fronted by the University or payment services rendered or to be rendered (including cost-reimbursable grants, progress payments, federal financial aid, directed payment programs, etc.) will threaten institutional liquidity.

9. Similarly, stop-work orders placed on existing federal awards will require immediate action by the University to reduce FTEs funded by projects receiving stop-work orders, and the incurrence of unfunded wind-down costs associated with unplanned shuttering of complex activities. Second- and third-order abrupt impacts are likely to spread to areas outside of the directly impacted activity, such as impacting recharge centers stood up to provide services specifically in support of federally funded research. Inability to plan for immediate cessation of indirect cost recovery generated by federal awards may require broader institutional reductions within the academy.

10. To date, the University has received more than 20 stop-work orders from federal agencies, and a handful where the University is a subrecipient and the prime recipient (non-federal agency) directed UW to stop work. These stop-work orders have injected considerable chaos into University operations and have required emergency contingency planning, although we understand that these orders are not currently effective, largely due to the Temporary Restraining Order issued by this Court.

11. As of February 3, 2025, the University is expecting payment for eligible

expenditures incurred by the University through performance of eligible activities in support of federal awards totaling \$87,429,436.73, including \$5,082,147.48 in draw requests on federal letters of credit, as shown below:

	Letter of Credit		
	Draw	Invoiced	Grand Total
<b>Federal Receivables</b>	<b>5,082,147.48</b>	<b>82,347,289.25</b>	<b>87,429,436.73</b>
<b>Federal Direct Award Receivables</b>	<b>5,082,147.48</b>	<b>29,515,494.32</b>	<b>34,597,641.80</b>
Department of Agriculture		842,038.69	842,038.69
Department of Commerce		50,693.49	50,693.49
Department of Defense		21,039,269.98	21,039,269.98
Department of Education	1,130,441.96	10,410.87	1,140,852.83
Department of Energy	-	263,740.53	263,740.53
Department of Health and Human Services	640,701.17	5,885,039.13	6,525,740.30
Department of Homeland Security		4,060.67	4,060.67
Department of the Interior		60,246.55	60,246.55
Department of Transportation		226,232.46	226,232.46
Department of Veterans Affairs		678,128.84	678,128.84
Federal Trade Commission		11,271.10	11,271.10
General Services Administration		1,946.17	1,946.17
Institute of Museum and Library Services		71,134.53	71,134.53
National Aeronautics and Space Administration		367,412.56	367,412.56
National Endowment for the Arts		3,868.75	3,868.75
National Science Foundation	3,311,004.35		3,311,004.35
<b>Federal Pass-Through Award Receivables</b>		<b>52,831,794.93</b>	<b>52,831,794.93</b>
Agency for International Development		56,002.37	56,002.37
AmeriCorps		29,393.49	29,393.49
Department of Agriculture		125,928.47	125,928.47
Department of Commerce		760,017.30	760,017.30
Department of Defense		4,628,074.59	4,628,074.59
Department of Education		707,323.26	707,323.26
Department of Energy		2,036,542.23	2,036,542.23
Department of Health and Human Services		34,949,660.55	34,949,660.55
Department of Homeland Security		260,315.58	260,315.58
Department of Justice		38,411.86	38,411.86
Department of State		16,669.56	16,669.56
Department of the Interior		428,721.65	428,721.65
Department of the Treasury		252,080.07	252,080.07
Department of Transportation		471,187.51	471,187.51
National Aeronautics and Space Administration		763,918.96	763,918.96
National Science Foundation		6,373,604.47	6,373,604.47
United States Environmental Protection Agency		933,943.01	933,943.01

12. If we do not experience timely and full receipt of these outstanding receivables and timely and full receipt of reimbursement for future allowable expenditures under the conditions of

our awards, it will result in the immediate cessation of mid-stream research activities, furloughing of staff, wind-down costs not typically borne by the University, and reputational risk.

13. Prior to January 31, when we understand this Court entered a Temporary Restraining Order, we had draw requests that were denied or held for longer than what has been typical of our experience. These include, for example, a draw request from the National Science Foundation of \$2,866,758 submitted on January 22 and subsequently denied, and draw requests from the Department of Health and Human Services on January 24, 29, and 30, totaling \$3,046,523.27, which were delayed. Following the entry of the TRO, however, the Department of Health and Human Services draw requests were approved on February 3, and funds were received on February 4. The University was required to resubmit a draw request to the National Science Foundation, unsuccessfully on February 3, and subsequently successfully on February 4.

14. If the federal funding is again paused, blocked, denied or delayed, that will be devastating to the University of Washington, as detailed above.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed this 5th day of February 2025, in Seattle, Washington.

*Sarah Norris Hall*

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SARAH NORRIS HALL  
Vice President of Finance, Planning &  
Budgeting and Chief Financial Officer  
University of Washington